

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

BETHANY CHRISTIAN SERVICES;
BETHANY CHRISTIAN SERVICES OF
MICHIGAN; and BETHANY CHRISTIAN
SERVICES USA, LLC,

Case No. 1:24-cv-0922- JMB-PJG

Hon. Jane M. Beckering

Plaintiffs,

v.

SUSAN CORBIN, in her official capacity as
director of the MICHIGAN DEPARTMENT
OF LABOR AND ECONOMIC
OPPORTUNITY; and POPPY SIAS
HERNANDEZ, in her official capacity as
Executive Director of the OFFICE OF
GLOBAL MICHIGAN,

Defendants.

**PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION
ORAL ARGUMENT REQUESTED**

EXPEDITED CONSIDERATION REQUESTED

Plaintiffs Bethany Christian Services Bethany, Christian Services of Michigan, and Bethany Christian Services USA, LLC (collectively, "Bethany Christian") move for entry of a preliminary of injunction under Rule 65 of the Federal Rules of Civil Procedure ordering that:

Defendants shall preserve the status quo regarding Bethany Christian's provision of refugee-related services in the Grand Rapids, Kalamazoo, and Traverse City areas under the contracts in effect on September 9, 2024, and shall not transition services to other providers from Bethany Christian pending final judgment in this action.

Additionally, given the immediate and irreparable harm Bethany Christian is facing to transition the provision of services on September 30, 2024, Bethany Christian respectfully requests expedited consideration of this motion. Specifically, Bethany Christian requests that this Court hold an evidentiary hearing on the motion and issue an Order on this motion by September 26, 2024. Expedited consideration is within the Court's authority, as "[d]istrict courts ordinarily enjoy broad discretion in matters of pretrial management, scheduling, and docket control." *Kimble v. Hosoi*, 439 F.3d 331, 336 (6th Cir. 2006).

This motion is supported by the Verified Complaint (ECF No. 1; PageID.1), the Exhibits to the Verified Complaint (ECF No.1-1 to 1-22; PageID.36-270), and the accompanying Brief in Support.

In compliance with Local Rule 7-1(c)(i), Bethany Christian's counsel emailed counsel for the Defendants on September 10, 2024 to ascertain whether this motion will be opposed. Defendants' counsel responded on September 11, 2024 requesting additional information which Bethany Christians' counsel provided. As of the time of the filing of this motion, Defendants' counsel has not yet responded to the email containing the additional information.

Date: September 11, 2024

/s/ Matthew T. Nelson

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**Application for admission submitted*

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USA, LLC*